

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA

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UNITED STATES OF AMERICA,

Case No. 22-CR-222 (NEB/TNL)

Plaintiff,

v.

**MOTION TO MODIFY  
CONDITIONS OF RELEASE**

KHADAR JIGRE ADAN,

Defendant.

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Khadar Jigre Adan, by and through his undersigned attorneys, respectfully moves the Court for an order modifying his terms of release to allow him to temporarily leave the State of Minnesota and the United States on April 16, 2024 to travel to Kenya, Ethiopia, and Dubai for business purposes. He will return to the United States no later than June 5, 2024.

Pretrial services assigned Mr. Adan as a category 1 for pretrial risk assessment, the category least likely to fail to appear. Mr. Adan was given permission on July 12, 2023 to travel to Turkey, Kenya, and Ethiopia [Dkt. 110] and again on September 24, 2023 to Turkey, Kenya, and Dubai [Dkt. 122]. He returned as promised on both occasions. Mr. Adan's risk of flight is negligible.

We also respectfully request that the Judge order U.S. Probation to return Mr. Adan's passport to him for purposes of this trip and also order that upon his return to

Minnesota he will again provide the passport to U.S. Probation. Mr. Adan's probation officer, Corey Grandner, does not object to this request.

On November 2, 2023, Mr. Adan's trial was scheduled for March 11, 2024. On January 22, 2024, at the government's request and unopposed by the defense, the trial has now been continued to August 19, 2024. The defense has communicated with Assistant United States Attorney Joseph Thompson who does not oppose this Motion for Modification.

Dated: March 5, 2024

Respectfully submitted,

/s/ William J. Mauzy

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